

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED**March 30, 2020****KAREN MITCHELL
CLERK, U.S. DISTRICT COURT**

United States of America)

v.)

Tania Delarosa)

Case No. 3:20-mj-302-BN)

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*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 27, 2020 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:*Code Section*18 U.S.C. § 2113(a)
(Attempted Bank Robbery)*Offense Description*

The defendant did knowingly and intentionally attempt to take, by force and violence, and by means of intimidation, from the person and presence of another, namely, an employee of the Bank of America, located at 9226 E R L Thornton Freeway, Dallas, Texas, United States currency belonging to and in the care, custody, control, management and possession of Bank of America, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based on these facts:

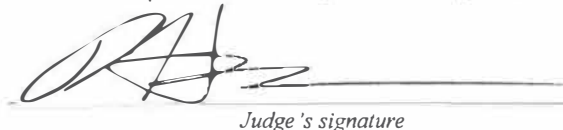
See attached affidavit of FBI Task Force Officer Stephen Prince.

☒ Continued on the attached sheet.
Complainant's signature

STEPHEN PRINCE, FBI Task Force Officer

Printed name and title

Agent sworn and signature confirmed before me via reliable electronic means pursuant to Fed. R. Crim. P. 4.1.

Date: March 30, 2020
*Judge's signature*City and state: Dallas, Texas

DAVID L. HORAN, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

TANIA DELAROSA

NO.

**AFFIDAVIT IN SUPPORT OF COMPLAINT
AND APPLICATION FOR ARREST WARRANT**

I, Stephen Prince, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws of the United States. I am a Task Force Officer with the Federal Bureau of Investigation (FBI). I am currently assigned to the FBI Violent Crimes Task Force in Dallas, Texas, and have been since approximately March 2018. Prior to that time, I was assigned to the Dallas Police Robbery Unit. I have been in the Robbery Unit for four years. During my time as a Task Force Officer, I have assisted with numerous investigations and used various investigative techniques, including electronic and physical surveillance, interviews of witnesses and defendants, the use of pen registers and trap and trace devices, the execution of search warrants, and the use of confidential informants. As part of my duties, I have participated in investigations involving violations of 18 U.S.C. § 2113(a), that is, Bank Robbery.

2. The facts in this affidavit come from my own personal observations and information provided to me by other law enforcement personnel and witnesses. I have

not included each and every fact known to me concerning this investigation. This affidavit is intended to show only that there is sufficient probable cause for the arrest of **Tania Delarosa** for Attempted Bank Robbery in violation of 18 U.S.C. § 2113(a).

PROBABLE CAUSE

3. The FBI, in conjunction with the Dallas Police Department, has been investigating bank robberies in the Dallas Division of the Northern District of Texas. This investigation concerns a violation of 18 U.S.C. § 2113(a) (Attempted Bank Robbery).

4. At approximately 3:05 p.m. on March 27, 2020, Dallas police officers responded to an attempted robbery at the Bank of America located at 9226 E R L Thornton Freeway, Dallas, Texas, a location within the Dallas Division of the Northern District of Texas. Deposits at the above-referenced Bank of America are insured by the Federal Deposit Insurance Corporation.

5. During the subsequent investigation, officers learned that the subject had entered the bank and presented a note to bank teller stating that the subject had a gun and demanding money. The note also contained a threat that the subject would go to the teller's house and kill her family. The teller immediately notified the bank manager and additional employees, who in turn called 911. The subject then fled the location on foot without any money.

6. The subject was described to 911 as a Hispanic female wearing sunglasses, a green hoodie jacket, and blue jeans. Officers arrived at the offense location, confirmed the subject description, and learned that the subject had left the location approximately

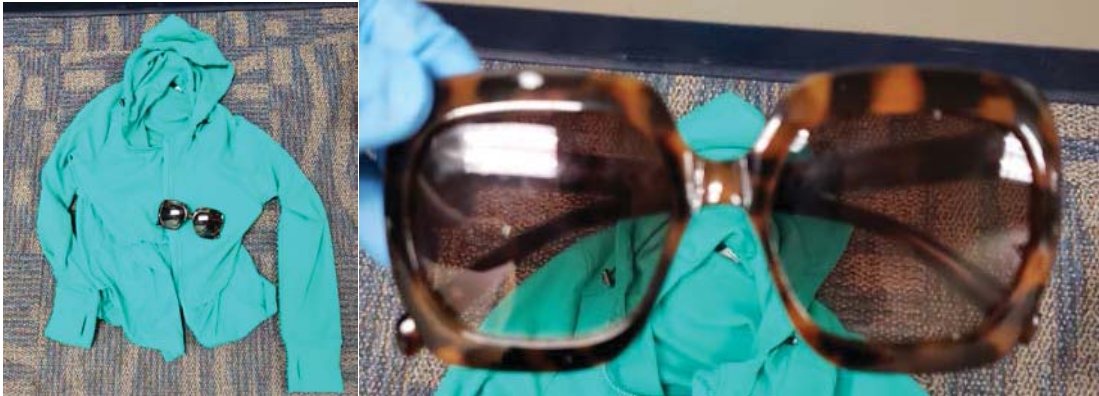
five minutes prior to the officers' arrival. Officers were told that, as the subject fled the building on foot, she took off the green jacket she was wearing, revealing a striped shirt underneath. The subject continued southbound, then eastbound on foot from the offense location. Officers broadcast this information on the police radio.

7. Officers at the offense location took custody of the robbery note that the subject left at the offense location. They were also provided with a still shot of the subject (pictured below) taken from bank surveillance footage of the offense:



8. Officers who were canvassing the surrounding area immediately after the offense observed a Hispanic female who appeared to match the subject description getting onto a DART bus around the Walmart located near the Bank of America. Officers stopped the DART bus at 3300 N. Buckner Boulevard, Dallas, Texas, detained the female, and identified her as Tania Delarosa. Officers from the bank traveled to 3300 N. Buckner Boulevard and identified Delarosa as the same person in the still shot from the surveillance footage. Subject Delarosa was arrested. Delarosa was wearing the same striped shirt that was visible in the still shot. The green jacket and sunglasses worn

during the offense (pictured below) were recovered in the bag that Delarosa still had with her.



9. Delarosa was transported to Dallas Police Headquarters where she was placed in an interview room. During an audio/video recorded interview, Delarosa was read her *Miranda* warnings and then voluntarily waived her rights and agreed to speak about what she had done. Delarosa confirmed that she wrote the demand note for the robbery prior to entering the Bank of America, and that she presented it to the bank teller. Delarosa admitted that she intended to rob the Bank of America.

CONCLUSION

10. Based on the foregoing, there is probable cause to conclude that Tania Delarosa committed the crime of Attempted Bank Robbery in violation of 18 U.S.C. § 2113(a).

Respectfully submitted,


A handwritten signature in blue ink, appearing to read "Stephen Prince", written over a horizontal line.

STEPHEN PRINCE

Task Force Officer

Federal Bureau of Investigation

Agent sworn and signature confirmed before me via reliable electronic means pursuant to Fed. R. Crim. P. 4.1 on March 30, 2020.

A handwritten signature in black ink, appearing to read "David L. Horan", written over a horizontal line.

DAVID L. HORAN

United States Magistrate Judge

Northern District of Texas